

October 22, 2003

Dr. Bruce Harter
Superintendent
Brandywine School District
1000 Pennsylvania Avenue
Claymont, DE 19703

Dear Dr. Harter:

The Office of Auditor of Accounts has completed its investigation of the following complaint received through the Auditor's HOTLINE. The following paragraphs detail the results of our review.

BACKGROUND

On March 26, 2003, the Office of Auditor of Accounts received a HOTLINE complaint regarding Concord High School. The complainant lodged the following allegation:

Students are attending Concord High School (in the Brandywine School District) who live in Pennsylvania and are using Delaware addresses. The students are avoiding paying the State of Delaware or Brandywine School District for their education. The complainant stated that he had evidence to support his allegation. The complainant stated that he gave a list of student names to the Principal, and the Principal said she would not do anything about it.

On April 15, 2003, Mr. R. Dale Abbott, Auditor III, and Ms. Barbara J. Mooney, Auditor III, met with the complainant to discuss the allegation.

On April 23, 2003, Mr. Edward L. Watson, Field Audit Manager, Ms. Barbara J. Mooney, Auditor III, and Mr. Christopher McDowell, Auditor I, met with the following Brandywine School District officials to discuss the allegation: Dr. Bruce Harter, Superintendent, Ms. Ellen Marie Cooper, District Legal Counsel, Ms. Judy Curtis, Director of Educational Services, and Mr. John Croney, Internal Auditor.

On May 9, 2003, Ms. Barbara J. Mooney, Auditor III, and Mr. Christopher McDowell, Auditor I, met with the following Concord High School personnel: Dr. Cheryl Morton, Principal, Mr. Harvey Harvey, Assistant Principal, Ms. Anne Lambert, Assistant to the Principal, Ms. Bonnie Smith, Secretary, and Ms. Carol Oreszczyn, Secretary in the Guidance Office.

On May 23, 2003, Ms. Barbara J. Mooney, Auditor III, and Mr. Christopher McDowell, Auditor I, met with Mr. Dave Brady, the District Visiting Teacher.

On June 19, 2003, Ms. Barbara J. Mooney, Auditor III, met with Mr. Al Madelyn, Assistant Principal at Concord High School.

AUDIT SCOPE AND METHODOLOGY

We reviewed pertinent records maintained by Concord High School and the visiting teacher; reviewed Concord's written procedures regarding verification of student addresses; reviewed documentation provided by the complainant; reviewed applicable sections of the Delaware Code; and interviewed Brandywine School District officials, Concord High School personnel, and the complainant.

INVESTIGATION RESULTS

Our investigation of the allegation revealed the following:

According to the principal of Concord High School, in February 2003 she received a folder containing printouts of real estate data for eighteen students. The printouts were provided by Mr. Ron Burkett, a teacher at Concord High School. He indicated that the students might be out-of-state residents. The school's investigation of the complaint consisted of the following: The assistant to the principal looked up the students' names in the school's computer to check if the students' addresses were in Concord's feeder pattern, and, if not, to see if the student was in the Choice program. This check revealed that one student's address was not in Concord's feeder pattern and the student was not in the Choice program. The student was questioned and she said she had moved. The student was permitted to stay at Concord through the end of the school year. There was no documentation indicating that the student will have to withdraw. The principal said that the visiting teacher was not sent out to verify the addresses of these eighteen students.

During our review, we identified some inconsistencies in the information provided to us, and some areas that warrant follow up, including the following:

1. A school employee said if a student is suspected of having an address different from the one in the school's computer, the student will be called to the office, or the parent will be called to find out what their address is. The school employee said she would take a verbal say so. She said "we're on the honor system that the address is what the student says." She said the school accepts a verbal say so from the student or parent as verification of a new address. Written procedures prepared by this employee on April 17, 2003, indicated that a new address could be verified verbally with the student,

or through a phone call. The procedures do not indicate that proof of residency is required when a student moves to a new address.

2. Several school employees stated that one visiting teacher couldn't do all the address verification visits needed by the district. However, the visiting teacher stated that he does not receive more requests for visits than he is able to do, and he performs all the visits that are requested.
3. School officials said mass mailings, such as newsletters, which are mailed every month, and interim mailings, which are mailed each marking period, produce returned mail that is investigated by the visiting teacher. However, another school employee said that only first class mail gets returned – bulk mail doesn't get returned. And the only first class mail that goes out to all of the students is the final report card, which is at the end of the year.
4. The school does not maintain documentation of complaints, questions or suspicions regarding addresses, or a record of their investigation and resolution. The school does not maintain documentation of address changes, phone calls to parents or conversations with students regarding addresses. The school does not maintain documentation showing what is done with the information obtained by the visiting teacher during a visit.
5. A school employee's file of visiting teacher paperwork (for the most recent school year) showing which students the visiting teacher was requested to visit did not agree with the visiting teacher's file of visits for Concord. For example, the school employee indicated that she requested that the visiting teacher perform visits on all returned mail. However, there were fourteen copies of returned mail envelopes in the school employee's file for students that the visiting teacher had no record of investigating.
6. Several school officials indicated that the following scenario occurs at the school. The officials felt that this is not an appropriate procedure. They said that a person claiming to be a student's relative, such as an aunt, will write down on a piece of paper that the student lives with her, and will get the paper notarized, and the school accepts the paper and does not require proper proof of residency.
7. There were conflicting opinions regarding what constitutes proof of residency. The visiting teacher gave the auditors written guidelines from Mount Pleasant that say that proof of residency is a utility bill, rent receipt or home sales contract; a driver's license is not accepted. A school official stated that proof of residency is a utility bill or a driver's license. Another school employee said she accepts a utility bill, a mortgage or a rental agreement. Another school official pointed out that it's very easy for someone to get their name on a utility bill – all they have to do is call the utility company and tell them to

change the name on the bill. He said people could buy a lease form at a stationery store, and fill it out any way they want. Auditor's note: A driver's license is not adequate proof of residency because a person can move and not inform the Division of Motor Vehicles of their new address. (Title 14, Del. C., C. 2, §202 (e)(1) b. says the student must have "... suitable documentation certifying that the student resides within the district...") However, "suitable documentation" is not defined.

8. There were conflicting accounts of what happens when returned mail is received. A school employee said she gives a copy of all the returned mail envelopes to the visiting teacher for him to perform a visit. The visiting teacher said when someone wants him to verify an address as a result of returned mail; he gets the actual returned envelope, not a copy of the envelope. He said he gives the envelope back to the school when he has completed the visit, and the school calls the student down, and gives the student the mail. Another school official said returned mail is put in the mailboxes of school officials for them to follow up on. He said he contacts the parent and tells them they must bring in documented proof of residency. If he cannot get cooperation from the parent, he will request a visit by the visiting teacher.
9. The visiting teacher said that a visit is initiated when a school employee gives him the Referral for Visiting Teacher Form, and that this was done throughout the entire school year. This does not agree with what the school employee said, and this does not agree with the paperwork. The school employee said for the first part of the school year, she did not give the visiting teacher any referral forms because she did not know she was supposed to. She said later in the year, she changed her procedure and gave him referral forms. However, there were no referral forms in the school employee's file. The visiting teacher had only three referral forms from Concord.

INVESTIGATION CONCLUSIONS

Based on the results of our review of applicable documentation and interviews with Concord High School personnel, we concluded that school officials did not adequately investigate the allegation. Procedures should be established regarding the investigation of questionable addresses and the verification of student residences. Guidelines should be established defining what constitutes valid proof of residency, and the school should require adequate proof of residency for students having new addresses.

RECOMMENDATIONS

WE RECOMMEND THAT the Brandywine School District establishes and implement written procedures that will provide guidelines for the following areas:

- Prepare a record of complaints and questions regarding the accuracy of student addresses.
- Establish specific actions to be taken to adequately investigate complaints and questions regarding the accuracy of student addresses, and identify the individuals responsible for taking those actions.
- Document the actions that are taken to investigate questionable addresses, the outcome of the investigation, contacts made with the student and parents, the receipt of documents providing proof of residency, and the updating of student records.
- Establish procedures to be followed to investigate returned mail, and identify the individuals responsible for carrying out those procedures.
- Establish guidelines defining what constitutes residency and what specific documents are required for proof of residency for students whose addresses are known or suspected to be different from the address on file. A verbal statement from the student or the parent does not constitute proof of residency.

The results of this investigation were discussed with District Officials during a meeting on July 23, 2003. Representing the Office of Auditor of Accounts were Mr. Edward L. Watson, Field Audit Manager, and Ms. Barbara J. Mooney, Auditor III.

AUDITEE'S CORRECTIVE ACTION PLAN

On August 26, 2003, the Office of Auditor of Accounts received the Brandywine School District's Corrective Action Plan to the recommendations. See the enclosed letter.

Dr. Bruce Harter
Page 6
October 22, 2003

AUDITEE'S RESPONSE



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BRUCE HARTER, Ph.D.
Superintendent

Inspire and Challenge Every Child Every Day

NANCY A. DOOREY
President, Board of Education

JOSEPH BRUMSKILL
Vice President, Board of Education

August 26, 2003

Mr. R. Ronald Draper
Chief Administrative Auditor
Office of the Auditor of Accounts
401 Federal Street
Townsend Bldg., Suite One
Dover, DE 19901

Dear Mr. Draper:

The Brandywine School District has established written procedures providing corrective action in response to the recommendations in your letter dated 7/31/03.

Brandywine School District agreed to and implemented the following:

- A record of complaints and questions received regarding the accuracy of student addresses
- Procedures to verify student residency and investigate questionable addresses. Requirements for and proof of residency were reviewed and revised.
- Forms for the purpose of documenting the outcome of the investigation, contacts made with the student and parents, proof of residency documents and the updating of student records.
- Procedure for investigation of returned mail and record of investigation and responsible staff member
- Student Registration Requirements were revised to reflect concerns raised by the Office of the State Auditor.

The supporting documentation is attached for your review. Please let me know if you have any questions.

Sincerely,

Bruce Harter
Superintendent

Dr. Bruce Harter
Page 7
October 22, 2003

AUDITOR'S COMMENTS

We concur that the District has taken appropriate corrective action in response to our recommendations.

Sincerely yours,

OFFICE OF AUDITOR OF ACCOUNTS

R. Ronald Draper, CGFM
Chief Administrative Auditor

RRD:ELW:BJM:MKT
Control Number 2002-091